

### **REMARKS**

Pursuant to the above-noted Office Action, claims 12, 26, and 38 are objected to as being dependent upon a rejected base claim, but are otherwise allowable. The applicant thanks the Examiner for the thorough review of the application and the finding of allowable subject matter in these claims. The applicant has amended the rejected base claims and otherwise believes that the rejected base claims are allowable as discussed below.

Claims 1, 2, 10-12, 14, 18, 19, 25, 30, 31, and 39 were rejected under 35 U.S.C. 102(b) as being anticipated by Okajima et al. (U.S. Patent No. 4,980,829) ("Okajima"). Claims 3-5, 20, and 32 were rejected under 35 U.S.C. 103(a) given Okajima in view of Eberman et al. (U.S. Patent No. 5,805,775) ("Eberman"). Claims 6-9 and 21-24 were rejected under 35 U.S.C. 103(a) given Okajima in view of Monaco (U.S. Patent No. 6,434,523) ("Monaco"). Claims 15-17 and 27-29 were rejected under 35 U.S.C. 103(a) given Okajima in view of Mohri et al. (U.S. Patent No. 6,243,679) ("Mohri"). Claims 33-37 were rejected under 35 U.S.C. 103(a) given Okajima in view of Eberman and in further view of Monaco. Claims 40-42 were rejected under 35 U.S.C. 103(a) given Okajima in view of Eberman and further in view of Mohri. The applicant respectfully traverses these rejections and requests reconsideration.

The applicant has amended various claims to clarify what is claimed. Further, the applicant has cancelled claims 6-9 and rewritten them as newly presented independent claim 43 and dependent claims 44-46. Dependent claims 47-58 correspond to original claims 2-5 and 10-17 rewritten to be dependent on newly presented independent claim 43.

Independent claims 1, 18, and 30 have been rejected under 35 U.S.C. 102(b) as being anticipated by Okajima. Okajima discloses a machine translation system for translating text from one language to another. In general, Okajima discloses the assignment of domain numbers and part numbers to portions of text to be translated by a user of the translation system. The domain and part numbers are then used to determine which of a set of previously stored grammar rules apply to translate a given amount of text. Okajima fails to disclose or suggest that any of the disclosed systems or methods are applicable to natural language dialog systems. Further, Okajima fails to disclose more than one layer of rules in the grammar used to translate the text.

As amended, independent claims 1, 18, and 30 specify that the claimed new grammar is to be a grammar for a natural language dialog system. Because Okajima does not disclose a grammar for use in a natural language dialog system, the applicant respectfully requests that independent claims 1, 18, and 30 be passed to allowance.

Further, independent claims 1, 18, and 30 specify that the new grammar include multiple layers including, for example, at least a query level umbrella rule, domain objects, and attributes as claimed in claim 1. The grammar of Okajima only specifies a single set of rules. (*See e.g.* Okajima FIG. 9.) Instead of creating a new grammar of several layers as claimed by the applicant, Okajima discloses choosing which previously saved rules to apply to translate text where the rules are chosen based on the categorization of the text by domain and part number. (*See e.g.* Okajima FIG. 10; column 7, lines 40-42.) Because Okajima does not disclose the multiple layers for the new grammar claimed by the applicant, the applicant respectfully requests that independent claims 1, 18, and 30 be passed to allowance.

Claims 2-5 and 10-17 are ultimately dependent upon claim 1, which claim has been shown allowable above. Similarly, claims 19-29 are ultimately dependent upon claim 18, which claim has been shown allowable above. Also, claims 31-42 are ultimately dependent upon claim 30, which claim has been shown allowable above. In addition, these claims set forth subject matter that, particularly when considered in context with the claims from which they depend, constitutes additional incremental patentable subject matter. For all these reasons, the applicant respectfully submits that claims 2-5, 10-17, 19-29, and 31-42 may be passed to allowance.

Original claim 6 has been rewritten in independent form as newly presented claim 43. Original claim 6 was rejected under 35 U.S.C. 103(a) given Okajima in view of Monaco. The Okajima reference has been characterized above. For the same reasons as discussed above in connection to claims 1, 18, and 30, newly presented independent claim 43 is patentable over Okajima. Further, claim 43 requires that objects are selected and presented to a developer such that the developer may choose whether to include the selected object in the new grammar.

Monaco discloses a graphical tool for allowing a developer of a natural language speech recognition grammar to create and edit such grammars. The tool disclosed by

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Monaco allows a developer to automatically create a graphical representation of a grammar and convert a modified graphical representation of a grammar into a code based grammar.

First, because Okajima's disclosure is limited to manipulating a grammar for translating text from one language to another, Okajima is non-analogous art to Monaco, which is limited to providing a tool for creating and editing grammars for natural language speech recognition. As such, Okajima and Monaco cannot be properly combined under 35 U.S.C. 103(a) to reject claim 43.


Further, Okajima teaches away from a direct selection of rules by a developer who is creating a new grammar. Okajima teaches that the grammar rules selected from a previously stored set of grammar rules are preferably previously established and stored in a file based on domain and part number. (See Okajima at column 7, lines 42-49.) This suggestion directly teaches away from having a grammar developer individually select objects to include in a new grammar as claimed by the applicant in claim 43. Therefore, Okajima cannot be properly combined with Monaco to under 35 U.S.C. 103(a) to reject claim 43. Applicant for the above reasons, therefore, respectfully requests that claim 43 be passed to allowance.

Claims 44-58 are ultimately dependent upon claim 43, which claim has been shown allowable above. In addition, these claims provide subject matter that, particularly when considered in context with the claims from which they depend, constitutes additional incremental patentable subject matter. For all these reasons, the applicant respectfully submits that claims 44-58 may be passed to allowance.

There being no other rejections of the claims, the applicant respectfully submits that claims 1-5 and 10-58 may be passed to allowance.

Respectfully submitted,

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